

WITNESS LIST

Bruno, et al. v. Chertoff, et al.; Civil No. 03-00567

1. Lucas Bruno
c/o Michael Jay Green, Esq.
345 Queen Street, 2nd Floor
Honolulu, HI 96813

Will testify regarding his employment with TSA; his observations of and interactions with TSA supervisors on Maui; his observations and complaints of discrimination; complaints about him while he was employed at TSA; disciplinary action taken against him; his termination from TSA; damages; and other related matters.

2. Christopher Gahr
c/o Michael Jay Green, Esq.
345 Queen Street, 2nd Floor
Honolulu, HI 96813

Will testify regarding his employment with TSA; his observations of and interactions with TSA supervisors on Maui; his observations and complaints of discrimination; complaints about him while he was employed at TSA; disciplinary action taken against him; his termination from TSA; damages; and other related matters.

3. Charles Turner
c/o Michael Jay Green, Esq.
345 Queen Street, 2nd Floor
Honolulu, HI 96813

Will testify regarding his employment with TSA; his observations of and interactions with TSA supervisors on Maui; his observations and complaints of discrimination; complaints about him while he was employed at TSA; disciplinary action taken against him; his termination from TSA; damages; and other related matters.

4. Tom Young
c/o Michael Jay Green, Esq.
345 Queen Street, 2nd Floor
Honolulu, HI 96813

EXHIBIT "A"

Will testify regarding his employment with TSA; his observations of and interactions with TSA supervisors on Maui; his observations and complaints of discrimination; complaints about him while he was employed at TSA; disciplinary action taken against him; his termination from TSA; damages; and other related matters.

5. Henriette Aki
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and termination from TSA, and other related matters.

6. Barry Alford
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

7. Angela Allen
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

8. Charles Allen
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and termination from TSA, and other related matters.

9. Debra Ames
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

EXHIBIT "A"

10. Judith Anderson
777 Hana Highway, #307
Paia, Maui, HI 96779

May be called to testify about her observations of discriminatory comments and actions during her employment at TSA Maui; her observations of and interactions with Plaintiffs; complaints of discrimination; and other related matters.

11. Kaehalani Aruda
(Former TSA employee - Address unknown at this time.)

May be called to testify regarding her observations of Plaintiff Charles Turner and any statements she prepared regarding Plaintiff Charles Turner.

12. Kehaunani Aruda
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and termination from TSA, and other related matters.

13. Arlene Ashton, EEO Counselor
TSA, Internal Programs Division
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify about her involvement and interaction with Plaintiffs regarding their respective complaints of discrimination, and other related matters.

14. Karen Asiu
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

15. Karie Atai
(Former TSA employee)

EXHIBIT "A"

(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

16. Robert Au
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

17. Lisa Baker
Human Resources Specialist
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

18. Darrell Bal
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

19. Rida Baria
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary

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action taken against her and termination from TSA, and other related matters.

20. Dennis Barrows
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

21. Hartelaus Battle
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

22. Ronald Beck
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

23. Paula Bookter
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

24. Susan Bos
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her observations of and interactions with Plaintiffs, and in particular Plaintiff Lucas Bruno; TSA policies& procedures; and other related matters.

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25. Brendan Bouey
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against his and resignation from TSA, and other related matters.

26. Freeman Bowley, III
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

27. Brandee Carvalho
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

28. Filbert Carvalho
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

29. Mary Carvalho
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

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30. Marc Casperino
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

31. Walter Chapman
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

32. Andrew Chenoweth
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and termination from TSA, and other related matters.

33. Patti Cipro
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

34. Patrick Collins
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

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35. James Costner
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

36. Beatrice Cox
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

37. Robert Crawford
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

38. Uilani Danley
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her interactions with and observations of Plaintiffs; complaints she made about Plaintiffs and other TSA employees; TSA policies& procedures, and other related matters.

39. Amanda Domingo
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

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40. Randall Doss
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

41. Joanna Estes
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

42. John Estrella
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and termination from TSA, and other related matters.

43. Ernesto Evangelista
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

44. Duane Fawkner
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

45. Devie Feig
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and termination from TSA, and other related matters.

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46. Alan Fernandez
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and termination from TSA, and other related matters.

47. Robin Fowler
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

48. Debra Frey
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and termination from TSA, and other related matters.

49. Matthew Fuller
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation from TSA, and other related matters.

50. Cindy Garcia
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation from TSA, and other related matters.

51. Chad Gardanier
(Former TSA employee)
(Address unknown at this time)

EXHIBIT "A"

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

52. Jason Giangli
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

53. Michael Gieber
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

54. Davelyn Gordon
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

55. Anita Gray
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

56. Theresa Greenisen
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.

EXHIBIT "A"

Honolulu, HI 96850

May be called to testify regarding her observations of and interactions with Plaintiffs; her observations regarding an incident that occurred on or about October 17, 2002 that Plaintiff Christopher Gahr was written up for by Filbert Carvalho; TSA policies and procedures; and other related matters.

57. Eperone Gurr
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

58. Shana Hall
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

59. Russell Harlan
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

60. Shellyann Hee
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

61. Sheldon Holokai

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(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding his employment with TSA; including any disciplinary action taken against him and resignation/termination from TSA, and other related matters.

62. Steven Hoopai
(Former TSA employee)
(Address unknown at this time)

May be called to testify regarding her employment with TSA; including any disciplinary action taken against her and resignation/termination from TSA, and other related matters.

63. Patti Igarashi
232 South Papa Avenue
Kahului, HI 96732

May be called to testify regarding her employment with TSA; her observations and interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints about her regarding discrimination; and other related matters.

64. Chuck Karlan
(Employee or former employee of TSA)

May be called to testify regarding his observations at TSA Maui; TSA policies& procedures; complaints regarding discrimination, and other related matters.

65. Gary Leavitt
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; statement he prepared regarding Charles Turner; TSA policies& procedures; complaints regarding discrimination, and other related matters.

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66. Jamie Lee
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, damages, and other related matters.

67. Lowery Leong
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

68. Nashly Leslie
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her observations and interactions with Plaintiffs; her statement about Plaintiff Charles Turner; TSA policies& procedures; and other related matters.

69. Lizabeth Masuda
(Former TSA Employee)
(Address unknown at this time.)

May be called to testify regarding her interactions with Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

EXHIBIT "A"

70. Earl Owens
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; statement he prepared regarding Plaintiff Charles Turner; TSA policies& procedures; complaints regarding discrimination, and other related matters.

71. Frank Paulson
1367-B Malaihi Road
Wailuku, HI 96793

May be called to testify regarding his employment at TSA, his observations of discrimination at TSA, his interactions with Plaintiffs; complaints regarding discrimination, and other related matters.

72. Ruth Paulson
1367-B Malaihi Road
Wailuku, HI 96793

May be called to testify regarding her employment at TSA, her observations of discrimination at TSA, her interactions with Plaintiffs; complaints regarding discrimination, and other related matters.

73. Tina Perez (n.k.a. Tina Perez Tamashiro)
(Former TSA employee - address unknown at this time, but living in Las Vegas, NV)

May be called to testify regarding her observations of and interactions with Plaintiffs; her observations of Plaintiff Tom Young and any statements she prepared concerning Plaintiff Tom Young.

74. Karen Phaneuf
(Former TSA Employee)
550 Akolea Place
Wailuku, HI 96793

EXHIBIT "A"

May be called to testify regarding her observations of and interactions with Plaintiffs, her involvement in disciplinary actions taken against and termination of Plaintiffs; statements she prepared regarding Plaintiffs Lucas Bruno and Christopher Gahr; TSA policies& procedures; complaints regarding discrimination; and other related matters.

75. Everett Reinhardt
(Former TSA Screener while Plaintiff Chris Gahr was employed.)

May be called to testify regarding her observations of discriminatory statements and conduct during her employment at TSA Maui; complaints regarding discrimination; her interaction with and observations of Plaintiffs; and other related matters.

76. Joe Ann Reinhardt
(Former TSA Screener while Plaintiff Chris Gahr was employed.)
(Address unknown at this time.)

May be called to testify regarding her observations of discriminatory statements and conduct during her employment at TSA Maui; complaints regarding discrimination; her interaction with and observations of Plaintiffs; and other related matters.

77. Leonardo A. Sequeira
LEO/Wackenhut Security
(Address unknown at this time.)

May be called to testify regarding statement he prepared regarding Plaintiff Charles Turner, and other related matters.

78. Howard Tagamori
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding his interactions with Plaintiffs; his involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

79. Jason Thomas

EXHIBIT "A"

(Employed at TSA while Plaintiff Christopher Gahr was employed with TSA on Maui).
(Address unknown at this time.)

May be called to testify regarding his observations at Kahului Airport during his employment with TSA; discriminatory actions and comments he observed/heard; his interactions with Plaintiffs; TSA policies& procedures; complaints regarding discrimination, and other related matters.

80. Denise Vogel
P.O. Box 1915
Wailuku, HI 96793

May be called to testify regarding her observations and interactions with Plaintiffs; her observations of Plaintiff Tom Young and any statements she prepared regarding Tom Young.

81. Ann Werstler
(TSA Employee while Plaintiff Tom Young was employed; address unknown at this time.)

May be called to testify regarding her interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; discriminatory actions and comments she observed at TSA; TSA policies& procedures; complaints regarding discrimination; and other related matters.

82. Angela Williams
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her interactions with Plaintiffs; her involvement in disciplinary actions taken against and termination of Plaintiffs; TSA policies& procedures; complaints regarding discrimination, discriminatory actions and comments she observed at TSA; and other related matters.

83. Pamela Wilson
c/o Thomas A. Helper, Esq.
Assistant U.S. Attorney

EXHIBIT "A"

Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

May be called to testify regarding her observations of and interactions with Plaintiffs; her statement about Plaintiff Charles Turner; TSA policies& procedures; and other related matters.

84. Plaintiffs reserve the right to supplement this list with the names of all former TSA employees who resigned or were terminated during the period of January 2002 to December 2003, including but not limited to employees identified on two (2) rosters of employees that were recently produced by Defendant. This witness list will be supplemented with the names of all former TSA employees who resigned or were terminated during the period of January 2002 to December 2003.

85. Plaintiffs also reserve the right to supplement this list with the names of any other witness whose identity becomes known through any outstanding and/or supplemental responses to Plaintiffs' discovery requests.

86. Any and all witnesses identified by Defendants.

87. Any and all Rebuttal Witnesses.

EXHIBIT "A"